

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WING SHING PRODUCTS (BVI) LTD., *

Plaintiff, *

v. *

CIVIL ACTION: 01 CIV. 1044(RJH)
(Hon. Richard J. Holwell)

SIMATELEX MANUFACTURING
COMPANY, LTD., *

Defendant. *

SIMATELEX MANUFACTORY COMPANY'S
REQUESTS FOR ADMISSIONS TO
WING SHING PRODUCTS (BVI) LTD.

Simatelex Manufactory Company, Ltd. (Simatelex) propounds the following requests for admissions to Wing Shing Products (BVI), Ltd. (Wing Shing):

1. Neither Mr. Sham, nor anyone from Wing Shing, has ever discussed the existence of the purported Sham Patent (the "Patent"), or any matters relating to that Patent, to include the matters litigated in the case of *In re AI Realty Marketing of New York, Inc.*, with anyone at Simatelex.

ADMITTED: _____

DENIED: _____

2. Before this litigation was filed, Mr. Sham believed that Simatelex was manufacturing the Mr. Coffee coffeemaker in violation of the Patent.

ADMITTED: _____

DENIED: _____

3. Before this litigation was filed, Wing Shing believed that Simatelex was manufacturing the Mr. Coffee coffeemaker in violation of the Patent.

ADMITTED: _____

DENIED: _____

4. Before this litigation was filed, neither Mr. Sham, nor anyone at Wing Shing, ever notified in any way anyone at Simatelex of the existence of the Sham Patent.

ADMITTED: _____

DENIED: _____

5. Before this litigation was filed, neither Mr. Sham nor Wing Shing gave any type of notice to Simatelex of Wing Shing's contentions that Simatelex was infringing the Patent.

ADMITTED: _____

DENIED: _____

6. Before this litigation was filed, neither Mr. Sham nor Wing Shing gave any type of notice to Simatelex of Wing Shing's contentions that Sunbeam was infringing the Patent.

ADMITTED: _____

DENIED: _____



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for

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CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of Aug., 2004, served copies of these Requests for Admissions on the counsel whose names are listed below by facsimile and by placing copies in the United States mail, properly addressed and postage prepaid.



ORRIN K. AMES, III

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